

The Honorable Judge John H. Chun

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JESUS CASTILLO, MARK KNOWLES, ALEX
RODRIGUEZ and NICHOLAS JAMES
THROLSON, individually, and on behalf of those
similarly situated,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION, a
Washington corporation,

Defendant.

Case No. 2:23-cv-01548-JHC

**STIPULATED MOTION AND
ORDER OF DEFENDANT'S TIME
TO ANSWER**

**NOTE ON MOTION CALENDAR:
NOVEMBER 7, 2023**

STIPULATION

Pursuant to Local Rule 7(j), Plaintiffs Jesus Castillo, Mark Knowles, Alex Rodriguez, and Nicholas James Throlson ("Plaintiffs") and Defendant Costco Wholesale Corporation ("Defendant") hereby respectfully submit this stipulated motion for an extension of time for Defendant to answer, move or otherwise respond to Plaintiffs' Complaint – Class Action ("Complaint") and, in support thereof, state as follows:

1. Plaintiffs filed their Complaint on October 6, 2023;
2. Pursuant to Fed. R. Civ. P. 12 (a)(1)(A)(i), Defendant's current deadline for responding to Plaintiffs' Complaint is November 9, 2023;

3. Good cause exists to grant the extension because counsel for Defendant was recently retained and needs additional time to review the allegations, investigate the underlying facts, and analyze issues regarding coordination and consolidation of multiple additional, similar, matters pending against Defendant, before preparing Defendant's response;

4. This motion is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion; and

5. Subject to Court approval, the Parties stipulate and agree that Defendant shall have an extension of time up to and including December 11, 2023 to answer, move or otherwise respond to Plaintiffs' Complaint.

WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that Defendant be granted an extension of time up to and including December 11, 2023 to answer, move or otherwise respond to Plaintiffs' Complaint.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 7th day of November 2023.

s/ Kristin M. Asai

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Attorney for Plaintiffs

ORDER

It is so ORDERED:

Defendant shall have an extension of time up to and including December 11, 2023 to answer, move or otherwise respond to Plaintiffs' Complaint.

Dated this 8th day of November, 2023.

By: 
Hon. Judge John H. Chun
United States District Judge

Presented by:

s/ Kristin M. Asai
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